

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Suzhou Meilin Import and Export Co., Ltd.,

Plaintiff

v.

Yan Lyu dba STARWHISPER,

Defendant

Case No. 1:25-cv-06766-JRB-AB

Honorable John Robert Blakely

Magistrate Albert Berry III

**SECOND STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT AND
TO CONTINUE STATUS REPORT DEADLINE**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and subject to the approval of this Court, the undersigned counsel for Plaintiff and Defendant hereby stipulate and agree that Defendant's time to answer or otherwise respond to the Complaint shall be extended through and including **August 12, 2025**, and that the parties' deadline to file a joint status report shall be continued to at least one week following the new response deadline. In support of this stipulation, the parties jointly state as follows:

1. Plaintiff filed the Complaint for copyright infringement on June 18, 2025. (ECF No. 1.)
2. Plaintiff served the Summons and Complaint on Defendant via email on June 24, 2025. (ECF No. 12.)
3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendant's initial

deadline to respond to the Complaint was July 15, 2025.

4. On July 3, 2025, this Court ordered the parties to file a joint status report by July 22, 2025. (ECF No. 13.)

5. On July 15, 2025, the parties filed a first stipulation to extend Defendant's deadline to respond to the Complaint to August 5, 2025, and to extend the status report deadline to August 12, 2025. (ECF No. 14.)

6. On July 16, 2025, the Court granted the parties' stipulation, setting Defendant's response deadline for August 5, 2025, and the status report deadline for August 12, 2025. (ECF No. 15.)

7. Good cause exists for a further short extension of time for the following reasons:

- Defendant and its counsel require additional time to investigate the factual allegations in the Complaint and to prepare a complete and appropriate response. Defendant is actively gathering information from a third party and needs additional time to complete the review process.
- The parties also wish to use the additional time to explore settlement discussions.

WHEREFORE, for good cause shown, the parties respectfully and jointly request that the Court:

1. Extend Defendant's deadline to answer or otherwise respond to the Complaint to August 12, 2025; and
2. Continue the deadline for the parties to file a joint status report to at least one week after August 12, 2025, or such other date as the Court deems appropriate.

Dated: July 31, 2025

/s/ David Silver

David Silver

Bayramoglu Law Offices, LLC

1540 West Warm Springs Road, Suite 100

Henderson, Nevada 89014

Email: david@bayramoglu-legal.com

Counsel for Plaintiff

Suzhou Meilin Import and Export Co., Ltd.

/s/ Michelle Dunn

Michelle Dunn

(PHV application pending)

Platinum Intellectual Property

3031 Tisch Way, Ste 110 PW,

San Jose, CA 95128

E-mail: michelle.dunn@platinum-ip.com

Counsel for Defendant

Yan Lyu dba STARWHISPER

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2025, the foregoing document was served on all counsel of record using the Court's CM/ECF system, which will send notification of such filing to any CM/ECF participants.

Respectfully submitted,

/s/ Michelle C. Dunn

Michelle C. Dunn
Platinum Intellectual Property
3031 Tisch Way, Suite 110 PW
San Jose, CA 95128
Tel: 404-800-5884
Fax: 877-463-0654
Email: michelle.dunn@platinum-ip.com

Attorney for Defendant